IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA WESTERN DIVISION CASE NO. 5:13-cv-00721-FL

MARIAN SNOW,)
Plaintiff,	
) MOTION FOR LEAVE TO
v.) WITHDRAW AS COUNSEL FOR
) DEFENDANT GLOBAL CREDIT AND
GLOBAL CREDIT AND COLLECTION) COLLECTION CORPORATION
CORPORATION,)
,)
Defendant.)

Pursuant to Local Civil Rule 83.1(g), William J. Long IV and the law firm of Burr & Forman, LLP (collectively "Burr & Forman") hereby moves this Court for leave to withdraw as counsel of record for Defendant Global Credit and Collection Corporation ("Global"). In support of its Motion to Withdraw as Counsel, Burr & Forman respectfully states as follows:

- 1. Burr & Forman and Global have agreed to the substitution of Michael D. Alltmont and the law firm of Sessions, Fishman, Nathan & Israel, LLC, and Amy L. Rich and the law firm of Doughton Rich Blanacto PLLC, as new counsel of record for Global in this case moving forward.
- 2. As a result, on or about October 24, 2014, Michael D. Alltmont of Sessions, Fishman, Nathan & Israel, LLC entered an appearance as counsel of record for Global. Amy L. Rich of Doughton Rich Blanacto PLLC thereafter also entered an appearance as counsel of record for Global on or about October 28, 2014.
- 3. With both Michael D. Alltmont and the law firm of Sessions, Fishman, Nathan & Israel, LLC and Amy L. Rich and the law firm of Doughton Rich Blanacto PLLC continuing to

represent Global in this matter, Global's interests will not be prejudiced in any way by Burr &

Forman's withdrawal.

4. Burr & Forman's Motion to Withdraw as Counsel is filed in good faith, with

Global's express consent, and not for the purpose of delay. Indeed, no trial date has been set in

this case, the deadline to complete discovery is not until March 20, 2015, and the dispositive

motion deadline is not until April 20, 2015.

WHEREFORE, Burr & Forman respectfully requests that this Court grant its Motion to

Withdraw as Counsel for Defendant Global Credit and Collection Corporation, permit William J.

Long IV and the law firm of Burr & Forman LLP to withdraw as counsel of record for Global in

this case, and provide such other and further relief as the Court deems just and proper under the

circumstances.

This 28th day of October, 2014.

Respectfully submitted,

s/William J. Long

William J. Long IV (N.C. Bar No. 34845)

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Counsel for Defendant

GLOBAL CREDIT AND COLLECTION CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of October, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Michael D. Alltmont
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I hereby certify that I have mailed by United States Postal Service the foregoing document to the following non-CM/ECF participants:

Marian Snow 907 Timberlake Dr. NW Wilson, North Carolina 27893

s/ William J. Long
OF COUNSEL